

In the United States District Court
for the Northern District of Indiana

Adam Scott,

*On behalf of himself and those
similarly situated,*

Plaintiffs,

v.

Freeland Enterprises, Inc., Dick Freeland, Deanna
Freeland, Todd Hollman, Tyler Freeland, John
Doe Corporation 1-10, John Doe 1-10;

Defendants.

Case No. 22-cv-00043-HAB-SLC

Notice of Motion for Approval of Settlement

Plaintiff Adam Scott moves this Court for an Order: (1) granting approval of the parties' settlement as set forth in the Settlement Agreement and Release ("Settlement Agreement" or "Settlement") and finding that the Settlement is fair, adequate, and reasonable and was the product of arm's length negotiations; (2) directing the distribution of the Settlement funds to the Opt-In Class Members in accordance with the Settlement Agreement; (3) approving the proposed Service Award for the named Plaintiff Adam Scott and directing distribution of the same in accordance with the Settlement Agreement; and (4) approving Class Counsel's proposed award of attorneys' fees, litigation costs and expenses, and class administration costs and directing the distribution of these approved amounts pursuant to the Settlement Agreement.

Submitted in support of the Motion are Plaintiff's Memorandum of Law in Support of Motion for Approval, the Declaration of Frank Raimond in support of Plaintiff's Motion for

Preliminary Approval and accompanying exhibits, and a proposed Order for the Court's consideration.

Respectfully submitted,

Date: May 17, 2023

/s/ Frank Raimond
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